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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

**All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**DECLARATION OF JEANNE C. FINEGAN
(I) REGARDING IMPLEMENTATION OF THE
DEBTORS' NOTICE PROCEDURES AND
SUPPLEMENTAL NOTICE PLAN AND (II) IN
SUPPORT OF THE DEBTORS' OBJECTION TO
CLASS REPRESENTATIVE'S MOTION TO
EXTEND APPLICATION OF FEDERAL RULE
OF CIVIL PROCEDURE 23 TO CLASS PROOF
OF CLAIM**

Re: Dkt. Nos.: 4370.

Date: November 19, 2019

Time: 10:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Judge: Hon. Dennis Montali

1 Pursuant to 28 U.S.C. § 1746, I, Jeanne C. Finegan, hereby declare as follows under penalty of
2 perjury:

3 **I. INTRODUCTION**

4 1. I am the Vice President of Notice Media Solutions at Prime Clerk LLC (“**Prime Clerk**”),
5 the Debtors’ court-appointed claims and noticing agent in these chapter 11 cases, and Chief Media
6 Officer of HF Media LLC, an affiliate of Prime Clerk.¹ Except as otherwise noted, this Declaration is
7 based upon my personal knowledge of the matters set forth herein, my review of relevant documents,
8 and information provided to me by PG&E Corporation and Pacific Gas and Electric Company
9 (collectively, the “**Debtors**”) and their agents and professionals, including professionals at Weil,
10 Gotshal & Manges LLP, Cravath, Swaine & Moore LLP, AlixPartners LLP, and Prime Clerk, and my
11 prior experience in bankruptcy and class action noticing, and if called and sworn as a witness, I could
12 and would testify competently thereto.

13 2. I submit this Declaration (i) to provide the Court with a report regarding the successful
14 and timely implementation of the Debtors’ robust multi-faceted plan and procedures for providing
15 notice of the Bar Date and the procedures for filing proofs of claims to known and unknown claimants
16 in the Debtors’ Chapter 11 Cases, including Known and Unknown Fire Claimants² (the “**Notice
Procedures**”), and (ii) in support of the Debtors’ objection, filed contemporaneously herewith, to the
17 *Class Representative’s Motion to Extend Application of Federal Rule of Civil Procedure 23 to Class
Proof of Claim* [Docket No. 4370]. In accordance with the Bar Date Order, the Debtors commenced
18 implementation of their Notice Procedures on July 1, 2019 and continued their efforts through the
19 Court-approved Bar Date of October 21, 2019 at 5:00 p.m. Pacific Time.
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¹ In July 2019, Heffler Claims Group, including its media division HF Media LLC, was acquired by Prime Clerk’s parent company.

² Capitalized terms used but not otherwise herein defined shall have the meaning ascribed to them in the *Order Pursuant to 11 U.S.C. Section 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(C)(3), 5005, and 9007, And L.B.R. 3003-1(I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and Manner of Notice Thereof, And (III) Approving Procedures for Providing Notice of Bar Date and Other Information to All Creditors and Potential Creditors* [Docket No. 2806] (the “**Bar Date Order**”).

1 **II. NOTICE EXPERTISE AND QUALIFICATIONS**

2 3. A comprehensive description of my credentials, expertise, and experience that qualify me
3 to provide an expert opinion and advice regarding notice in these Chapter 11 Cases, which include more
4 than 30 years of communications and advertising experience, specifically in the bankruptcy and class
5 action notice context is set forth in detail the *Declaration of Jeanne C. Finegan in Support of the*
6 *Debtors' Bar Date Motion and in Response to the Tort Committee's Bar Date Motion and Related*
7 *Filings* [Docket No. 2642] (the “**Original Declaration**”), which is incorporated herein by reference in
8 its entirety.

9 **III. SUMMARY OF THE RESULTS OF THE DEBTORS' NOTICE PROCEDURES**
10 **AND SUPPLEMENTAL NOTICE PLAN**

11 4. As set forth in my Original Declaration, at the time I submitted my Original Declaration,
12 it was my opinion that the Debtors’ Notice Procedures, including, the Supplemental Notice Plan, were
13 reasonable, effective, and went well-beyond the requirements of applicable law and due process. Based
14 on my experience, I believed that the Debtors’ Notice Procedures, and in particular the Supplemental
15 Notice Plan, were broad, multi-faceted, and designed to have the greatest possible reach to all creditors
16 and parties in interest, including those who may have relocated as a result of the Northern California
17 fires. Indeed, at the time I submitted my Original Declaration, it was my further belief that the Debtors’
18 Supplemental Notice Plan, which was amended prior to entry of the Bar Date Order to incorporate
19 certain additional aspects at the request of the TCC, was one of the largest and most comprehensive
20 notice and media campaigns recommended in chapter 11 history. As set forth in further detail below,
21 the Notice Procedures, as implemented, have been a resounding success and have exceeded the
22 estimated and projected results set forth in my Original Declaration. Specifically, the Supplemental
23 Notice Plan, as implemented, has exceeded the reach and frequency estimates set forth in my Original
24 Declaration, as follows:

Target Audience	Estimated Reach/ Frequency	Final Reach/ Frequency
Adults 18+ in the 4 DMAs	95% Reach / 8x	98% Reach / 16x
Adults 18+ in CA	81% Reach / 5x	88% Reach / 11x
Adults 18+ outside of CA and moved in the last 4 years	78% Reach / 2.3x	80% Reach / 3x

5. For context, the Debtors' Supplemental Notice Plan exceeds the combined reach and frequency levels of even the largest, most recent class action campaigns that had similar local, regional, and national outreach.

Case Name	Reach	Frequency
<i>Takata Auto Airbag Products Liability Settlement</i>	95%	4x
<i>BP Deepwater Horizon</i> ³	95%	4x
<i>Cook et. al v. Rockwell International Corp. and the Dow Chemical Co.</i> ⁴	96%	7x
<i>In re Payment Card Interchange Fee and Merchant Discount Antitrust</i>	82%	2.7x
<i>In re Air Cargo Shipping Services Canadian Antitrust</i>	77%	2.7x
<i>Spotify Publishing Settlement</i>	74%	2.6x
<i>Red Bull False Advertising Class Action</i>	72%	3.9x
<i>New Balance "Made in the USA" Class Action</i>	70%	4.1x

6. The Debtors' Notice Procedures were broad and multi-faceted, and were designed and implemented to maximize reach to all claimants, including Known and Unknown Fire Claimants, in a variety of ways, including through (i) direct mailings to known claimants, (ii) multiple local and national newspaper and magazine publication notices, (iii) digital advertising, including social media, social influencers, and other paid Internet search listings, (iv) television and radio advertising, (v) press releases, and (vi) extensive community and boots on the ground outreach efforts. Through these

³ Decl. of Cameron Azari, Rec. Doc. 7113-1, ¶¶ 5, 6.

⁴ Decl. of Jeanne C. Finegan dated March 30, 2017, Doc. No. 2432, at ¶¶ 30-31.

1 comprehensive efforts, the Notice Procedures delivered more than 730,000,000 impressions,⁵ i.e.
2 opportunities to see the Bar Date Notice, as follows:

Media Channel	Estimated Impressions
Direct Mailings	6,200,000
Social Media	411,505,264
Display Online	50,571,921
Magazine	53,489,000
Influencer	1,225,191
Out of Home (Billboards)	10,520,351
Over the Top TV (“OTT”)	1,437,291
Streaming Radio	3,179,525
Terrestrial Radio	23,774,300
National Cable Television	105,427,161
Local Cable Television	8,535,909
Local Broadcast Television	32,037,000
Newspaper Publication (National)	14,442,223
Newspaper Publication (Local)	8,553,710
<i>Estimated Total Impressions</i>	<i>730,898,846</i>

18 7. An impression translates into an opportunity to see a message in a given medium. Here,
19 it measures each time the Bar Date Notice is displayed and potentially viewed by claimants. For example,
20 each direct mailing of the Bar Date Notice sent out to Known Claimants constitutes one impression.
21 Every time, the Bar Date was displayed in a television advertisement similarly constitutes one impression
22 for each person estimated to be viewing the advertisement at the time of airing. Similarly, every time
23 someone had the opportunity to view the Bar Date Notice in one of the nearly 30 newspapers in which
24 the Debtors' published notice of the Bar Date constituted an impression. **The Debtors' delivered**

26 ⁵ As explained below, every time an advertisement is displayed, that instance is considered one
27 impression. One person may be exposed to numerous impressions.

1 **impressions, or opportunities to see the Bar Date Notice, actually exceeded the TCC's projected**
2 **impressions (620,000,000) in connection with its competing bar date motion.⁶**

3 8. The increase in media delivery under the Supplemental Notice Plan is due in large part to
4 our continuous active campaign management. The media team and Prime Clerk, in consultation with the
5 Debtors, actively managed and optimized all media channels to minimize waste and to increase audience
6 visibility and engagement. As the Supplemental Notice Plan progressed, the Debtors continued to refine
7 the media being used to provide notice of the Bar Date and related procedures by shifting budgets away
8 from under-performing channels and toward the more effective media channels and targeting that
9 objectively delivered the greatest results. Optimization decisions were based on, among other things,
10 data from attribution sources (*e.g.* Google Analytics) and other sources including social and general
11 media tools (*e.g.* Cision⁷ and Socialbakers⁸). These tools provide detailed, real-time insight regarding
12 the performance of an ongoing media campaign and allowed us to improve performance on a continuous
13 and evolving basis.

14 **IV. THE SUPPLEMENTAL NOTICE PLAN SUMMARY**

15 9. The Debtors' Notice Procedures were generally divided into two categories: (i) direct
16 mailings of the Court-approved Bar Date Notices, including customized Bar Date Notices that were
17 mailed to, among other parties, Known Fire Claimants and all of the Debtors' millions of Customers;
18 and (ii) the robust and unprecedented Supplemental Notice Plan designed to reach and provide
19 constructive notice to unknown claimants, including Unknown Fire Claimants, that included extensive
20 national and local newspaper publications and utilized other customized media tools. The summaries
21 below focus on the results of the Debtors' Supplemental Notice Plan.⁹ In accordance with the Bar Date
22 Order, the Debtors' Supplemental Notice Plan included the following noticing methods:

- 23 • Publication of the Bar Date Notice in three (3) nationally distributed magazines;
24 • Multiple publications of the Bar Date Notice in two (2) nationally circulated
newspapers;

25 ⁶ In reporting estimated impressions of 684,000,000, the TCC miscalculated its local impressions. Thus,
the TCC's total should have been 620,000,000.

26 ⁷ See <https://www.cision.com/us/>.

27 ⁸ See <https://www.socialbakers.com/>.

28 ⁹ An in-depth discussion of the results of direct mailing campaign completed by Prime Clerk at the
direction of the Debtors is set forth in the Declaration of Benjamin P.D. Schrag, submitted
contemporaneously herewith.

- 1 • Multiple publications of the Bar Date Notice in twenty-seven (27) local newspapers;
- 2 • Online display advertising in English and Spanish;
- 3 • Social media advertising on Facebook, Instagram and Twitter;
- 4 • Social Influencers;
- 5 • Google keyword searches;
- 6 • Out of Home advertising (*e.g.*, static billboards and digital boards);
- 7 • Online video advertising;
- 8 • Radio advertisements
 - 9 ◦ Terrestrial local radio advertisements (English and Spanish)
 - 10 ◦ Streaming radio advertisements
- 11 • Television advertising
 - 12 ◦ Nationwide cable television advertisements in English
 - 13 ◦ Local market cable television advertisements in English and Spanish
 - 14 ◦ Local broadcast television advertisements in English
 - 15 ◦ OTT television advertisements in English and Spanish
- 16 • Press Releases in English and Spanish distributed nationally
- 17 • Community outreach to over 230 groups in Northern California, including:
 - 18 ◦ Boots-on-the-ground in person distribution of the flyer to:
 - 19 ▪ FEMA camps
 - 20 ▪ Community events
 - 21 ▪ 70 PG&E service centers
 - 22 ▪ 6 PG&E claim centers
 - 23 • Informational websites in English, Spanish, Chinese and Vietnamese
 - 24 • Informational toll-free telephone

13 10. The results of each of the specific subcategories of the Supplemental Notice Plan are
14 discussed in further detail below.

15 **A. PRINT – MAGAZINE**

16 11. The Supplemental Notice Plan was expanded following input from the TCC to included
17 publication of a one-half page, black and white notice one (1) time in the national editions of *People*
18 *Magazine*, *Sport's Illustrated* and *Sunset Magazine*, which have a combined circulation of 6,680,000,
19 with over 48,000,000 readers.¹⁰ The magazine advertisements were written in plain English and
20 contained a Spanish sub-headline that directed Spanish-speaking claimants to the Debtors' claim
21 websites for more information in Spanish. The advertisements were published in accordance with the
22 below schedule:

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27 ¹⁰ Readership for both newspaper and magazines are calculated based on a pass-along factor. This is a
28 reader in addition to the subscriber that browses that title. For example, the pass along factor for a
newspaper is 2.11, the pass along factor for *People Magazine* is 10.21. That means for every subscriber
there is an average of 10.21 people who also read the title.

1	Magazine	Issue	On Sale	Circulation
2	<i>People Magazine</i>	August 5, 2019	July 26, 2019	3,031,000
3	<i>Sport's Illustrated</i>	August 26, 2019	August 22, 2019	2,715,000
4	<i>Sunset Magazine</i>	September/October	August 23, 2019	934,000

5 12. Attached as **Exhibit A** are proof of publication tear sheets of the published notice in these
6 magazines.

7 **C. PRINT - NEWSPAPER**

8 13. The complete Standard Bar Date Notice, which included specific information for Fire
9 Claimants and directions and other relevant information explaining how such parties may file a Fire
10 Claimant Proof of Claim Form, was published in two (2) nationally circulated newspapers:

11 A. *The Wall Street Journal* - The Bar Date Notice was published one (1) time in black
12 and white on July 17, 2019. The Wall Street Journal's circulation is 2,069,000.

13 B. *USA Today* - The Bar Date Notice was published three (3) times in black and white
14 on July 17, 2019, August 22, 2019 and September 26, 2019. USA Today's circulation
15 is 1,591,000.

16 14. To further enhance the outreach efforts locally and with input from the TCC, the full Bar
17 Date Notice was published three (3) times during the notice period in 27 local newspapers as a half-
18 page, black and white notice written in plain English and featured a Spanish sub-headline. The
19 additional papers were included to provide more thorough coverage of Northern California. Attached
20 as **Exhibit B** is a chart listing the newspapers and insertion dates as well as proof of publication
21 affidavits from each newspaper.

22 **D. ONLINE NOTICE**

23 15. In total, the online component of the Debtors' Supplemental Notice Plan served more
24 than 50,000,000 impressions to reach Fire Claimants. The Debtors' online notice campaign targeted
25 potential Fire Claimants based on considerations such as, among other things, geography and the target
26 audiences' characteristics, such as having recently moved from or previously lived in California. Banner
27 advertisements were served in English and Spanish across a whitelist¹¹ of approximately 4,000 websites,

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¹¹ A whitelist is a custom list of acceptable websites where advertising content may be served. This
allows the Debtors to control the quality of advertising inventory that is served to creditors. The creation

1 including top-tier news websites, local news websites, and Spanish language websites, among numerous
2 others, and across multiple platforms, including desktops, laptops, and mobile devices. The Debtors also
3 employed cutting-edge technology and data to match Known Fire Claimants' geographic locations to
4 active WIFI/IP addresses. As set forth above, each time an advertisement was served, that instance was
5 considered one impression.¹² Attached as **Exhibit C** are examples of the banner advertisements.

6 16. The Debtors' Supplemental Notice Plan also provided online notice to potential Fire
7 Claimants through advanced digital tactics such as keyword/term, contextual, audience data from
8 national change of address registries, and geography to residents in Lake, Sonoma, Napa, Mendocino,
9 Nevada, Butte, and Humboldt counties.

10 17. The online advertisements provided information for visitors to self-identify as potential
11 Fire Claimants, where they could "click" on the banner and then link directly to a website containing
12 information regarding the Bar Date and submission of claims with a further link to the Debtors' chapter
13 11 case website for additional information. The Debtors also retargeted users who visited the
14 informational website with additional notice reminders to take action.

15 **E. SOCIAL MEDIA**

16 18. Numerous and comprehensive tactics for providing notice to Fire Claimants were
17 deployed on multiple social media platforms. In total, more than 411,000,000 social media impressions
18 were served under the Debtors' Supplemental Notice Plan, which resulted in over 50,000 "likes" and
19 30,000 reactions.

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24 of a whitelist helps to ensure that advertisements are targeted to real websites where actual (human)
25 creditors are likely to visit, rather than serving advertisements to websites and fraudsters who are
26 attempting to fraudulently earn advertising revenue from the campaign, and thereby depriving actual
27 creditors of their opportunity to see the Bar Date Notice. Further, the whitelist helps to ensure that
advertisements will not appear next to offensive or objectionable content. The whitelist is actively
maintained over the campaign with site-level reporting of brand safety during campaign and culling of
improper or suspicious activity on websites. Further, as a measure of privacy, all advertisements feature
AdChoices icons whenever available.

28 ¹² Each time an advertisement is shown on a webpage, it is counted as one impression.

Property	Estimated Impressions	Engagement (likes, comments, shares)
Facebook/Instagram	406,481,000	50,000
Twitter	2,673,000	4,699
YouTube (English)	1,577,000	382
YouTube (Spanish)	774,000	171
Total	411,505,000	55,252

19. On Facebook and Instagram, more than 70 targeting resources were utilized to provide
 notice to potential Fire Claimants, including:

- Matching creditor records to target to a custom audience of known creditors;
- Targeting people who have engaged with, talked about, or shared content regarding the Northern California fires;
- Using profile location information to target individuals who moved out of California;
- Geographical targeting to FEMA housing locations and Paradise evacuation zone pages;
- Targeting to followers of pages including *Camp Fire Survivors*, and *Housing Connection Butte County Camp Fire*
- Targeting to members of awareness and support groups, including:

California Fires Support Group	Cal Fire/Wives Girlfriends Connect
California Fire Updates	California Fires Relief Online Auctions
Fire Northern Cal – Horse, Livestock	Fire Associated Pages
#WolseyFire – Redding	CalFire
Butte County Fires, Floods and Events	FEMA NorCal
Napa California Fire Crime Alert	NorCal Fire Resources
California Fires Support Group	Nor Cal Fire Chaplains Association
Camp fire aid for victims and displaced families	Housing Connection Butte County
California Regenerative Fire Recover and Preparedness	CampFire Paradise
Northern California Help/Donations Assistance (Camp Fire)	Butte-Glen 211

- Targeting to followers of school, community service and county groups, including:

Napa Fire Department	Sonoma County
Napa Police Department	Mendocino County
Napa Valley Unified School District	Nevada County
Napa High School	Butte County
Vichy Elementary School	Humboldt County

Alta Heights Elementary School

20. On Twitter, the Supplemental Notice Plan targeted people who have “tweeted”, or posted, about the fires using keywords or hashtags¹³ that included the following words or phrases, among others:

Butte fire	ParadiseStrong	CampFire
Redwood fire	Nevada wildfire	Mission fire
Lake wildfire	California wildfires	Pacific Gas wildfire
Camp Fire	Paradise Strong	Northern California fires
Campfire	Ghost ship	Pacific Gas fire
Humboldt wildfire	Northern California wildfires	Napa wildfire
Pacific Gas bankruptcy	PG&E bankruptcy	Butte wildfire
Lobo wildfire	GhostShip	Sonoma wildfire
Oakmont fire	Lobo fire	Ghostship
PG&E fire	California fires	Atlas wildfire
Pacific Gas & Electric fire	Atlas fire	Pacific Gas & Electric wildfire
Mendocino wildfire	Pacific Gas & Electric bankruptcy	
Mission wildfire	PG&E wildfire	

21. Finally, on YouTube, the Debtors' Supplemental Notice Plan cast a broad net to target people outside of California who have recently moved. Here, 30-second video advertisements were targeted based on the following key search terms, among others:

Story of survival	Camp Fire	Mission fire
Survivor stories	Fire survivor	Camp Fire

22. Attached as Exhibit D are copies of the social media advertisements.

F. SOCIAL INFLUENCERS

23. In order to leverage the highest indexing media to the youngest creditors, at the Debtors' direction the media team and Prime Clerk engaged social media influencers to post and share information about the Bar Date on Instagram and Facebook. We identified and selected key influencers who had a significant following within the 18-24 age demographic based on factors such as their personal

¹³ Twitter users put hashtags in their tweets to categorize them in a way that makes it easy for other users to find and follow feeds or “tweets” about a specific topic.

1 experience with the fires, that they resided in California, and/or that they have a significant following in
2 Northern California. This effort reached over 1,200,000 followers and resulted in nearly 20,000 social
3 engagements (i.e. clicks, comments and shares). Attached as **Exhibit E** are copies of the posts.

4 **G. SEARCH TERMS**

5 24. The Supplemental Notice Plan utilized Google AdWords and keyword search terms to
6 target potential Fire Claimants. When users entered on Google's search engine, target phrases and
7 keywords identified by the Debtors' Supplemental Notice Plan, informational advertisements with links
8 to the Debtors' Case Website appeared on the search result pages. Attached as **Exhibit F** is a full list of
9 the keyword search terms utilized in the Supplemental Notice Plan.

10 **H. OUT OF HOME**

11 25. To further enhance outreach and in consultation with the TCC, the Debtors expanded the
12 Supplemental Notice Plan to utilize 17 static or digital billboards in Butte, Humboldt, Mendocino, Napa
13 and Sonoma counties. The billboards appeared for nine (9) weeks and delivered more than 10,520,000
14 impressions as reported by GeoPath¹⁴ using data provided by the Traffic Audit Bureau. Attached as
15 **Exhibit G** is a map of the board locations and a copy of how they appeared.

16 **I. TERRESTRIAL AND STREAMING RADIO**

17 26. Terrestrial radio aired in English and Spanish in the 6 MSAs. A total of 24 local English
18 radio stations and 10 Hispanic stations were chosen to air approximately 2,680 terrestrial radio
19 advertisements. Attached as **Exhibit H** is a complete list of stations, their formats, broadcast language
20 and markets.

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27 ¹⁴ Geopath generates standard audience measurements for out of home media. It provides demographic-specific impressions, rating points, and reach & frequency measures for over a million pieces of out of
28 home inventory. <https://geopath.org>.

Radio	Spots Planned	Spots Delivered	Increase from Planned to Delivered
English	360	1,888	525%
Hispanic	180	792	440%
Total	540	2,680	496%

27. To further enhance notice and in consultation with the TCC, the Supplemental Notice Plan was expanded to include streaming audio advertisements (i.e. digital radio played via an internet connection), which ran on Pandora with 30-second spots. In many instances, a digital banner advertisement appeared while the audio spot was aired, allowing a user to click on the banner and be taken to the dedicated case website. Over 1.6 million streaming audio impressions ran.

J. TELEVISION

28. **Local Broadcast TV.** The Supplemental Notice Plan included broadcasting of 30-second television commercials throughout the course of the notice period, saturating the four Designated Market Areas (“DMAs”) (San Francisco-Oakland-San Jose, Sacramento-Stockton-Modesto, Chico-Reading and Eureka). A total of 2,010 commercials aired across approximately 14 local broadcast television stations, generating approximately 32,037,000 impressions to potential Fire Claimants in Lake, Sonoma, Napa, Mendocino, Nevada, Butte, and Humboldt counties. The commercials aired across a variety of dayparts,¹⁵ including morning, daytime, early news, and prime/syndicated prime to reach potential Fire Claimants with differing television viewing habits.

29. **Local Cable TV.** 2,025 commercials aired on local cable channels and generated approximately 8,535,909 impressions to expand awareness of the Bar Date to potential Fire Claimants and other parties. Attached as Exhibit I is a list of the local and cable stations in each market utilized by the Supplemental Notice Plan.

26 ¹⁵ A “daypart” is a term traditionally used when buying television but is also used for radio; it is a block of time that divides the day into segments for purchase, scheduling and delivery (*e.g.*, primetime, or for radio “drive time”). The dayparting method is often used to tailor content to specific audiences throughout the day.

1 30. **Nationwide Cable TV.** To reach those Fire Claimants who may have moved within the
2 last four years, 59 nationwide cable television commercials aired across CNN, FOX NEWS, History
3 Channel and TNT networks resulting in 105,427,161 impressions.

4 31. Importantly, the Debtors' Supplemental Notice Plan was expanded in consultation with
5 the TCC to incorporate digital OTT video advertisements on devices such as Roku, Amazon, Samsung
6 and PlayStation to serve video advertisements to a matched list of Known Fire Claimants and also
7 targeted potential Fire Claimants who have recently moved from California. Over 1,437,000 video
8 impressions were served via OTT.

9 **K. ADDITIONAL METHODS OF OUTREACH**

10 32. In addition to paid media outlets, the Supplemental Notice Plan employed earned media
11 and various avenues of public relations to amplify awareness of the Bar Date.

12 33. **Earned Media.** A total of three (3) press releases were issued during the course of
13 implementing the Supplemental Notice Plan, resulting in over 273 news mentions of the Bar Date. A list
14 of the media outlets mentioning the Bar Date are attached as **Exhibit J.**

15 34. **Community Outreach.** As a part of the Supplemental Notice Plan, extensive community
16 outreach efforts were conducted by Prime Clerk and its' media team throughout Northern California in
17 an attempt to reach as many potential Fire Claimants as possible. In connection with these efforts the
18 Debtors contacted more than 230 organizations to provide information regarding the Bar Date and related
19 procedures, including community organizations, religious organizations, business associations, school
20 districts, charitable foundations and disaster relief groups. Specifically, among others, Prime Clerk, at
21 the direction of the Debtors, contacted the following organizations and entities:

- 22 • Over 90 community based organizations within Butte County;
23 • 5 offices of the American Red Cross in the affected areas;
24 • 6 offices of the Salvation Army in the affected areas; and
25 • 35 different zones that make up the Camp Fire Zone Project, a grassroots community
26 organization connecting residents with resources and building community.

27 35. As a part of their extensive community outreach efforts, the Debtors distributed to these
28 various organizations and entities a plain English informational flyer describing the Bar Date and related
procedures, printed in full color and designed to capture the viewer's immediate attention with its bold
headline and active call to action. The flyer provided a concise and easy to understand summary of the

information contained in the Bar Date Notice, and prominently featured information regarding the Debtors' Chapter 11 Cases, the Case Website, and toll free number. In total over 49,000 flyers were printed and made available in English, Spanish, Mandarin, Vietnamese, Korean, and Tagalog. Attached as **Exhibit K** are the various flyers. Attached as **Exhibit L** is a complete list of the community groups and organizations contacted by the Debtors.

36. **Temporary Housing Outreach.** The Debtors’ Supplemental Notice Plan employed a boots-on-the ground approach to community outreach, with representatives reaching out in-person to various FEMA temporary housing sites. Due to FEMA privacy rules, the Debtors were not able to obtain specific information on the number of people still living in temporary FEMA housing; however, the Debtors were able to identify local FEMA housing sites and sent individual representatives to each location to distribute Bar Date flyers in English and Spanish and to answer questions regarding the proof of claim submission process.¹⁶

37. Additionally, through the Butte County Recovers newsletter, we were able to identify two non-FEMA temporary shelter locations.¹⁷ At the direction of the Debtors, Prime Clerk representatives visited each location and distributed flyers in English and Spanish and answered related questions.

38. **Paradise Revival Festival.** The Paradise Revival Festival, held in Butte County on October 12, 2019, was a gathering organized to help victims of the wildfires. At the event, the Debtors prominently positioned a table on “Recovery Row” where many resources were available to assist people affected by the wildfires. Our representatives, which included a bi-lingual speaker, were on site for the entirety of the festival. The Debtors took extra steps to be visible and to encourage attendees to visit the table, which included a bright yellow tablecloth and Prime Clerk/PG&E laminated signs. The full-color flyers, in English and Spanish, were available and distributed at the event.

M. THE SUPPLEMENTAL NOTICE PLAN GOES VIRAL

39. As part of the Debtors' active campaign management, my team worked with various third parties that agreed to include in their websites a link to the Debtors' website (www.pgewildfireinfo.com),

¹⁶ The FEMA temporary housing sites included Rosewood in Oroville, California, and the Silver Dollar Fairground in Chico, California.

¹⁷ The non-FEMA temporary housing sites identified were Lime Saddle Campground, Lake Oroville in Paradise, California, and the DeSabla Campground, Lake De Sabla, in Magalia, California.

1 and prominently feature the Bar Date Notice. Several other third parties participated on their own
2 volition, including Attorney Helen Sedwick, who posted a video on YouTube that provides step-by-step
3 instructions on how to file a Fire Proof of Claim.¹⁸ In addition, a student run university newspaper in
4 Ithaca, New York, approximately 2,700 miles away, published a story that highlighted the Bar Date and
5 summarized the process for filing proofs of claim.

6 40. Additionally, the websites below either mentioned the Bar Date deadline or featured links
7 to the www.pgewildfireinfo.com site:

- 8 • <https://www.pgefireinfo.com/>
- 9 • <https://www.norcalfirelawyers.com/pge-fire-claims-deadline->
- 10 • <https://www.lieffcabraser.com/2019/10/only-2-weeks-left-for-2017-and-2018-northern-california-wildfire-victims-to-file-claims-against-pge/>
- 11 • <https://www.disabilityrightsca.org/post/pge-fire-claims-deadline>
- 12 • <https://www.capersonalinjurycaselawnnotes.com/>
- 13 • <https://cawildfirelawyers.com/>
- 14 • <https://www.potterhandy.com/northern-california-fire-lawyers/>
- 15 • <https://www.walkuplawoffice.com/ca-wildfire-loss/>
- 16 • <https://thompsonlawoffice.com/northern-california-wildfire-victims-lawsuits-continues-despite-pge-bankruptcy-filing/>
- 17 • <https://www.kqed.org/news/11767118/northern-california-wildfire-victims-can-now-file-claims-with-pge>
- 18 • <https://www.latimes.com/opinion/story/2019-10-09/wildfire-victims-shortened-damage-claim-period>
- 19 • <https://neighborstogethersr.com/2019/10/08/claim-deadline-10-21-19-uninsured-and-underinsured-fire-survivors-fire-affected/>

20 41. In addition, Disability Rights of California’s Facebook page, which has over 9,100
21 followers and 8,400 “likes,” also posted information about the Bar Date.¹⁹

22 **P. ONLINE QUALITY CONTROL - ADVERTISEMENT FRAUD**
IDENTIFICATION, MITIGATION AND REPORTING

23 42. As described in my Original Declaration, the Debtors’ Supplemental Notice Plan
24 incorporated state of the art quality control mechanisms to ensure that the Debtors’ online advertisements
25 were properly targeted to real websites where actual humans are likely to visit, rather than serving
advertisements to websites and fraudsters that attempt to steal advertising revenue from the campaign
(thereby depriving actual Fire Claimants of their opportunity to see the Bar Date Notice).

26
27 ¹⁸ See <https://www.youtube.com/watch?v=a5d4fCwNTVI&feature=youtu.be>.

28 ¹⁹ See https://www.facebook.com/pg/DisabilityRightsCalifornia/posts/?ref=page_internal.

1 43. The Supplemental Notice Plan included in-advertisement, log, and site level monitoring
2 and management, utilizing one of the leading cyber security advertisement fraud expert service providers
3 in the country. I am pleased to report to the Court that less than one percent invalid impressions was
4 detected in this campaign, which is a remarkable achievement even when compared to large brand
5 campaigns. This invalid traffic has been excluded from the final reach calculations.

6 **V. CONCLUSION**

7 44. In my opinion, the robust and comprehensive outreach efforts employed for the Debtors'
8 Noticing Procedures, including the Supplemental Notice Plan, are unmatched in any chapter 11 case.
9 The efforts reflected a particularly appropriate, highly targeted, efficient and modern way to provide
10 notice to Known and Unknown Fire Claimants. The Debtors' Supplemental Notice Plan was broad and
11 multi-faceted and more than achieved its goal of maximizing reach to the target audiences.

1 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true
2 and correct to the best of my knowledge, information, and belief. Executed on November 11, 2019,
3 in Tigard, Oregon.

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